

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ORIGINAL

LATESSA SALONE,
JANET DEMARINIS,
ANDREA RAILA,
PAT QUINN, and
the petition signers of
the CUSTOMER UTILITY
CONVENTION

Petitioners.

Petition to the Members of the
Illinois Commerce Commission
Pursuant to Section 5-145 (b), 5-35, and 5-45 of
the Illinois Administrative
Procedure Act

01-321

CHIEF CLERK'S OFFICE

MAY 17 11 27 AM '01

ILLINOIS
COMMERCE COMMISSION

**MOTION FOR LEAVE TO FILE A SECOND AMENDED PETITION FOR AN
EMERGENCY RULE TO PROHIBIT ILLINOIS GAS AND ELECTRIC UTILITY
COMPANIES FROM DISCONNECTING SERVICE TO ANY RESIDENTIAL
CUSTOMER IN THE NEXT 150 DAYS**

Petitioners LaTessa Salone, Janet Demarinis, Andrea Raila, and Pat Quinn respectfully request that the Commission give the Petitioners leave to file a Second Amended Petition For An Emergency Rule To Prohibit Illinois Gas And Electric Utility Companies From Disconnecting Service To Any Residential Customer In The Next 150 Days. In support thereof, the Petitioners state as follows:

1. Since the Petitioners filed their Amended Petition for an Emergency Rule on May 8, 2001, the Illinois General Assembly has not acted on pending legislation to provide funding for emergency energy assistance to thousands of low-income Illinois residential consumers who are eligible for such assistance and are presently on a waiting list for funding.

2. As of May 15, 2001, a supplemental emergency energy assistance program called the Customer Arrearage Reduction Program (which was proposed by the City of Chicago and Peoples Gas on March 27, 2001) still is not ready to accept applications from low-income residential consumers in distress, including senior citizens and disabled citizens.

3. On May 15, 2001, Peoples Gas abruptly cancelled three carefully planned consumer town meetings on meter reading and estimated bill issues scheduled in Chicago for May 22, May 23, and May 24, 2001. Peoples Gas agreed to jointly sponsor these town meetings in a customer agreement approved by Peoples Gas on April 17, 2001, but cancelled the May town meetings because of ongoing labor negotiations. Peoples Gas will not reschedule these town meetings until an undetermined time in June, 2001.

4. On May 10, 2001, the 1050 Peoples Gas union workers who repair and install gas lines, turn on and disconnect gas services, and check complaints of gas leaks rejected Peoples Gas' contract offer by a wide margin and there is a real possibility that these highly-trained union workers may exercise their right to strike Peoples Gas in the near future.

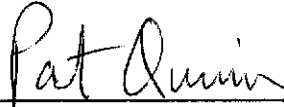
5. On April 11, 2001, Peoples Gas' executives told a Chicago City Council Committee that the sensitive service work currently performed by highly-trained union workers would be performed by field supervisors and newly-trained clerical workers in the event of a strike.

VERIFICATION

Now comes Pat Quinn who, after first being sworn, deposes and says:

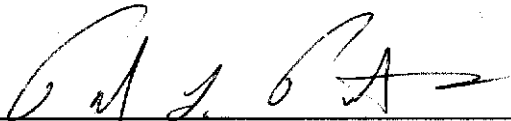
1. That he is a Petitioner and Attorney for the Petitioners in connection with the attached Motion for Leave to File a Second Amended Petition; and

2. That he has read the attached Motion for Leave to File a Second Amended Petition and that the facts alleged therein are true and correct to the best of knowledge and belief.



Pat Quinn

Subscribed and Sworn
before me this 16th day
of May, 2001



Notary Public



LATESSA SALONE,
JANET DEMARINIS,
ANDREA RAILA,
PAT QUINN, and
the petition signers of
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Pursuant to Section 5-145 (b), 5-35, and 5-45 of
the Illinois Administrative
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NOTICE OF FILING

Please take notice that on the 16th day of May, 2001, I filed with the Chief Clerk of the Illinois Commerce Commission via overnight delivery, the Motion for Leave to File a Second Amended Petition For An Emergency Rule To Prohibit Illinois Gas And Electric Utility Companies From Disconnecting Service To Any Residential Customer In The Next 150 Days with an attached copy of the Petition For The Emergency Rule, a copy of which is hereby served upon you.

I, Pat Quinn, hereby certify that I served the Motion for Leave to File a Second Amended Petition with an attached copy of the Second Amended Petition to all parties listed on the attached service via e-mail, fax, personal delivery, and United States mail, postage prepaid this 16th day of May, 2001.

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